

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: STEEL ANTITRUST
LITIGATION**

Case No. 08-cv-5214

Honorable James B. Zagel

**THIS DOCUMENT RELATES TO
ALL DIRECT PURCHASER ACTIONS:**

Standard Iron Works v. ArcelorMittal, et al.,
Case No. 08-cv-5214

Wilmington Steel Processing Co., Inc. v.
ArcelorMittal, et al., Case No. 08-cv-5371

Capow, Inc. d/b/a Eastern States Steel v.
ArcelorMittal, et al., Case No. 08-cv-5633

Alco Industries, Inc. v. ArcelorMittal, et al.,
Case No. 08-cv-6197

Gulf Stream Builders Supply, Inc. v.
ArcelorMittal et al., Case No. 10-cv-4236

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT WITH UNITED STATES STEEL CORPORATION, CONDITIONAL
CERTIFICATION OF A SETTLEMENT CLASS, AND APPROVAL OF NOTICE,
SUMMARY NOTICE AND NOTICE PLAN**

Pursuant to Federal Rules of Civil Procedure 23(a), 23(b)(3) and 23(e), Plaintiffs
respectfully move this Court to:

1. Grant preliminary approval to the proposed settlement with United States Steel Corporation;
2. Conditionally certify for settlement purposes the proposed Settlement Class;
3. Conditionally appoint Named Plaintiffs as Class Representatives, and appoint Fine,

Kaplan and Black, RPC, and Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C. as Co-Lead Class Counsel;

4. Approve the form and manner of giving notice of the proposed settlement to the Class; and

5. Set a date for a hearing on final approval of the settlement.

Plaintiffs have submitted a [Proposed] Preliminary Approval Order which is consistent with the relief requested herein.

Dated: July 8, 2014

Respectfully submitted,

Michael K. Kellogg
Mark C. Hansen
Michael J. Guzman
Steven F. Benz
**KELLOGG, HUBER, HANSEN,
TODD, EVANS & FIGEL, P.L.L.C.**
Sumner Square
1615 M Street, NW, Suite 400
Washington, DC 20036
Tel.: (202) 326-7900

/s/ Jeffrey S. Istvan
Roberta D. Liebenberg
Donald L. Perelman
Jeffrey S. Istvan
Matthew Duncan
Adam J. Pessin
FINE, KAPLAN AND BLACK, R.P.C.
One South Broad Street, 23rd Floor
Philadelphia, PA 19107
Tel.: (215) 567-6565

Interim Co-Lead Counsel for Plaintiffs and the Proposed Class

Michael J. Freed
Steven A. Kanner
FREED KANNER LONDON & MILLEN LLC
2201 Waukegan Road, Suite 130
Bannockburn, IL 60015
Tel.: (224) 632-4500

Liaison Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of July, 2014, I caused a true and correct copy of the foregoing **PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT WITH UNITED STATES STEEL CORPORATION, CONDITIONAL CERTIFICATION OF A SETTLEMENT CLASS, AND APPROVAL OF NOTICE, SUMMARY NOTICE AND NOTICE PLAN** to be filed and served electronically via the Court's CM/ECF system upon all registered users.

/s/ Jeffrey S. Istvan
Jeffrey S. Istvan